

For the foregoing reasons and the reasons previously stated in the State’s Memorandum in Law in Support of its Motion to Dismiss, Defendant, State of North Carolina, respectfully requests

that this Court grant its Motion to Dismiss, with prejudice, and dismiss all of the Plaintiffs' claims against it.¹

This the 15th day of June, 2022.

JOSHUA H. STEIN
ATTORNEY GENERAL

/s/ Matthew Tulchin
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¹ Plaintiff also filed a "Motion for Preliminary Injunction" with her Complaint. That motion should be denied for all the reasons previously set forth.

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.2, the undersigned counsel hereby certifies that the countable portion of the foregoing Memorandum, including body, headings, and footnotes, contains less than 500 words as measured by Microsoft Word.

This the 15th day of June, 2022.

/s/ Matthew Tulchin

Matthew Tulchin

Special Deputy Attorney General

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day served the foregoing REPLY MEMORANDUM OF LAW IN SUPPORT OF DEFENDANT STATE OF NORTH CAROLINA'S MOTION TO DISMISS in the above-captioned case on all parties to this cause by electronically filing the foregoing with the Court using the CM/ECF system.

This the 15th day of June, 2022.

/s/ Matthew Tulchin

Matthew Tulchin

Special Deputy Attorney General